

## EXHIBIT E

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

LANDSCAPE CONSULTANTS OF  
TEXAS, INC., and METROPOLITAN  
LANDSCAPE MANAGEMENT, INC.,

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS, and  
MIDTOWN MANAGEMENT DISTRICT,

Defendants.

Civil Action No. 4:23-cv-03516

**NOTICE OF INTENTION TO TAKE ORAL AND VIDEOTAPED DEPOSITION OF  
GERALD THOMPSON**

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TO: Plaintiffs Landscape Consultants of Texas, Inc. and Metropolitan Landscape Management, Inc., by and through their counsel of record, Erin E. Wilcox and Joshua P. Thompson of Pacific Legal Foundation, located at 555 Capital Mall, Suite 1290, Sacramento, CA 95814.

Please take notice that pursuant to the Federal Rules of Civil Procedure, the undersigned counsel for the City of Houston (the “City”), will take the oral and videotaped deposition of Gerald Thompson on **Wednesday, September 25, 2024**, beginning at **10:00 a.m. (CST)**, at the offices of **Husch Blackwell, LLP, 600 Travis Street, Suite 2350, Houston, Texas 77002**.

The deposition will continue from day to day until examination is completed, and the proceeding will be recorded by video and stenographic means before a court reporter authorized by law to administer oaths.

Respectfully submitted,

By: /s/ Ben Stephens  
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**ATTORNEYS FOR THE CITY OF HOUSTON**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been served upon all counsel of record via email on September 17, 2024.

*/s/ Ben Stephens*  
Ben Stephens